

# **EXHIBIT N**

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By Email and First Class Mail

October 2, 2017

Sean P. Carter, Esquire  
Scott Tarbutton, Esquire  
Cozen O'Connor, P.C.  
1650 Market Place  
Philadelphia, PA 19103-7301

Re: *In re Terrorist Attacks*, No. 03-MDL-1570

Sean and Scott,

Enclosed please find the Declaration of Dr. Adnan Basha (Sept. 30, 2017), which sets forth the information on his travels to the United States, and confirms that he does not have his passports for the 1992 to 2002 time period.

Further, the IIRO's annual report for 1421/22 (2000-2001) also listed Dr. Basha's international travel, which confirms his attendance at the United Nations meeting in New York in June 2001. *See* Document Bates-stamped 340871-341098, at 341073. However, Dr. Basha's participation in that meeting cannot form the basis for the exercise of personal jurisdiction. *See, e.g., Klinghoffer v. S.N.C. Achille Lauro*, 937 F.2d 44, 51-52 (2d Cir. 1991) (United Nations activities cannot form the basis for personal jurisdiction); *Sokolow v. Palestinian Liberation Organization*, No. 04-CV-00397 (GBD), 2011 WL 1345086, at \*5 (S.D.N.Y. Mar. 30, 2011) ("The Second Circuit has also held that participation in the United Nation's affairs by a "foreign organization" may not properly be considered as a basis of jurisdiction in New York."), *aff'd in relevant part*, 835 F.3d 317, 325 (2d Cir. 2016); *id.* ("With respect to the activities involving the New York office, Defendants are entitled to the *Klinghoffer* jurisdictional exception.").

Sincerely,

/s/ Alan

Alan R. Kabat

Enc.

cc: MDL 1570 counsel

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

\_\_\_\_\_  
*In re Terrorist Attacks on Sept. 11, 2001*  
\_\_\_\_\_

)  
) No. 03-MDL-1570 (GBD)(SN)  
)

**DECLARATION OF DR. ADNAN BASHA**

Under penalty of perjury, I attest that the following is true:

1. I, Dr. Adnan Basha, hereby provide the following information on my travels to the United States of America from 1992 through 2002.
2. I made two family vacation trips to Orlando, Florida in July 1997 and August 1999, accompanied by my wife and our four children.
3. In June 2001, I made a trip to New York to attend the meetings of the Special Committee of the United Nations General Assembly concerning children, and was accompanied by my two daughters.
4. I do not have my passports for that time period, and the above information is from my memory.

SIGNED: \_\_\_\_\_

Dr. Adnan Basha

DATED: \_\_\_\_\_

09/30/2017